

PUBLIC SUBMISSION

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Draft Chesapeake Bay Total Maximum Daily Load

Comment On: EPA-R03-OW-2010-0736-0001
Clean Water Act Section 303(d): Notice for the Public Review of the Draft Total Maximum Daily Load (TMDL) for the Chesapeake Bay

Document: EPA-R03-OW-2010-0736-0392
Comment submitted by Randall Williford, Stormwater Manager, Loudoun County, Virginia MS4

Submitter Information

Submitter's Representative: Randall Williford, Stormwater Manager
Organization: Loudoun County, Virginia
Government Agency Type: Local
Government Agency: Loudoun County Virginia MS4

General Comment

To Whom It May Concern,

I am the stormwater manager for the Loudoun County Virginia MS4. I have many questions and comments, but nearly all have been addressed in comments by VAMSA and NVRC. However, I haven't found anyone addressing the following:

In the draft TMDL, EPA has included backstop provisions for Urban Stormwater. They have responded to questions regarding those provisions by stating that they were developed by Virginia. In the TMDL, they are unclear. Under each type of land use, there are three separate bullets. If all were applied, action would be required on 100% of the land which seems an unlikely intent. The first bullet, in each land use type, is non-quantitative and indicates 100% runoff capture for reuse which also seems an unlikely intent. Following the land use breakdowns, there is an explanation that the WLA assumes that 50% of urban lands will meet this standard and 25% of non-urban lands will meet the standard.

If these end up appearing in the WIP, please clarify. If not, please help the EPA to clarify them in the TMDL. We cannot determine the impact on our MS4 without this clarification.

Thank you,

Randall Williford
Chief, Stormwater Management